

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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HVT, INC.,

Plaintiff,

-against-

PORT AUTHORITY OF NEW YORK AND
NEW JERSEY,

Defendant.

CASE NO.: 15-CV-5867(MKB) (VMS)

**DECLARATION OF
MARGARET TAYLOR FINUCANE
CERTIFYING THE RECORD**

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Margaret Taylor-Finucane, an attorney duly admitted to practice law in the State of New Jersey and before this Court, declares, under penalty of perjury and pursuant to 28 U.S.C. § 1746 that the following documents are true and correct copies of the record in this action.

1. Attached as Exhibit A is a true and correct copy of Plaintiff's Complaint filed on October 13, 2015.

2. Attached as Exhibit B is a true and correct copy of the Port Authority's Answer filed on January 13, 2016.

3. Attached as Exhibit C is a true and correct copy of relevant sections of The Port Authority Of New York And New Jersey Airport Rules and Regulations dated Issued August 4, 1999 (Bates No. PA0022-0036, 0111-126).

4. Attached as Exhibit D is a true and correct copy of The Port Authority of New York and New Jersey, Administrative Instructions, Impounded Vehicles #AI40-2.15, Bates Nos. PA0019-PA0021.

5. Attached as Exhibit E is a true and correct copy of the Port Authority Police Department's (PAPD) "Airport Procedures and Orders, revised February 3, 2000, Abandoned Car Detail Procedures (ACD) – JFKIA" ("ACD Procedures"), Bates Nos. PA0184-195.

6. Attached as Exhibit F is a true and correct copy of a January 16, 2007 Memo from PAPD Inspector Kassimatis, to Tour Commanders, Subject: District Attorney's Release for Impounds, Bates Nos. PA0182-183

7. Attached as Exhibit G is a true and correct copy of pages from the Port Authority of New York and New Jersey's website under "Port Authority Police -Impound Lots", (<http://www.panynj.gov/police/impound-lots.html>).

8. Attached as Exhibit H is a true and correct copy of the Defendant's Response to Plaintiff's First Set of Interrogatories dated and certified on March 10, 2016.

9. Attached as Exhibit I is a true and correct copy of the contents of the individual file folder for Impound # 97-15, which was created and maintained by PAPD.

10. Attached as Exhibit J is a copy of the September 4, 2015 letter from the Law Office of Rudolph J. Meola to Lieutenant Thomas Lomonaco, which was provided by Plaintiff to Defendant during discovery in this matter.

11. Attached as Exhibit K is a copy of the District Attorney release for Impound #97/15, dated October 2, 2015, which was provided by Plaintiff to Defendant during discovery in this matter.

12. Attached as Exhibit L is a true and correct copy of the Consent Stipulation dated December 11, 2015 and a Bond in the Sum of \$35,000.00.

JAMES M. BEGLEY, ESQ.
Attorney for The Port Authority of
New York and New Jersey

By: Margaret Taylor Finucane
Margaret Taylor Finucane

Dated: September 12, 2016